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July 3, 2012

BY ELECTRONIC COURT FILING

The Honorable Paul S. Diamond
United States District Court for the
Eastern District of Pennsylvania
U.S. Courthouse
601 Market Street, Room 6613
Philadelphia, PA 19106

Re: The Abi Jaoudi and Azar Trading Corp. v. Cigna Worldwide Ins. Co. et al.
U.S.D.C., E.D. of PA, Civil Action No. 91-6785

Dear Judge Diamond:

This firm and co-counsel Grippo & Elden, LLC represent Martin Kenney, a non-party respondent in the above-referenced matter. In a July 2, 2012 letter filed by Cigna Worldwide Insurance Company (Doc. 327), Cigna asks the Court to rule immediately on its pending motion to compel discovery. We write to advise the Court that Mr. Kenney intends to file a timely response to Cigna's motion to compel on July 12, 2012. We respectfully request that the Court consider all responses prior to issuing any ruling. We also note that non-party respondents James Little and Echemus have asked the Court to hold a Rule 16 conference before ruling.

Respectfully yours,

Robert C. Clothier

RCC/rdl

cc: Gary M. Miller, Esquire (via ECF)
Derek T. Ho, Esquire (via ECF)
Donald W. Hawthorne, Esquire (via email)
Joseph A. Tate, Esquire (via ECF)

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